

September 21, 2015

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed Revisions to On-Board Diagnostic System Requirements (Board Item obdii2015)

The Northeast States for Coordinated Air Use Management (NESCAUM) appreciates the opportunity to comment on proposed revisions to the On-Board Diagnostic (OBD) System requirements relating to collection of carbon dioxide (CO₂) emissions performance data. NESCAUM is the association of state air pollution regulatory agencies in the New England states and New York and New Jersey. Most of our member states, including Connecticut, Maine, Massachusetts, New Jersey, New York, Rhode Island, and Vermont, have adopted California's Low Emission Vehicle Program using the authority provided under Section 177 of the Clean Air Act.

NESCAUM supports the proposed changes to §1968.2 of Title 13 of the California Code of Regulations. These changes would incorporate additional data stream parameters into OBD systems to enable improved characterization of real-world CO₂ emissions and fuel economy performance. Verification of actual emissions and fuel economy performance is important for an accurate accounting of greenhouse gas emission reduction benefits. NESCAUM believes that the staff's proposal adequately protects consumer privacy by ensuring that data: 1) will be stored only in aggregated form, 2) cannot be used to identify a vehicle's current or past location or its manner of operation, and 3) will only be collected from vehicles whose owners voluntarily agree to allow its collection. We note that a recent report by the National Academies of Science recommends the use of onboard diagnostic systems to collect real-world fuel economy data from light-duty vehicles.¹

For the foregoing reasons, NESCAUM supports ARB's proposed changes to the OBD requirements.

Sincerely,



Matt Solomon
Transportation Program Manager

¹ National Research Council, 2015. Cost, Effectiveness and Deployment of Fuel Economy Technologies for Light-Duty Vehicles. <http://www.nap.edu/catalog/21744/cost-effectiveness-and-deployment-of-fuel-economy-technologies-for-light-duty-vehicles>